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January 10, 2025

**VIA ECF**

Hon. Cathy Seibel  
U.S. District Court for the Southern District of New York  
The Hon. Charles L. Brieant Jr.  
Federal Building and U.S. Courthouse  
300 Quarropas St.  
White Plains, NY 10601-4150

***Re: Pamela Wimbish & Patricia Onken v. IBM***  
**No.: 23-cv-8327**

Dear Judge Seibel,

We represent Plaintiffs in the above-referenced matter. We write on behalf of both parties to respectfully inform the Court that Defendant has decided not to oppose Plaintiffs' motion to amend their Complaint. IBM, however, denies the allegations and reserves all rights to oppose the claims, including via its response to the amended Complaint and its anticipated motion for summary judgment. Accordingly, contemporaneously with this letter, Plaintiffs are filing their unopposed motion papers for the Court's consideration. The parties respectfully request that the Court deem the motion fully briefed and ready for its determination.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/Lucas C. Buzzard  
Lucas C. Buzzard